

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA

Herbert Hamlett, Terrell Saunders  
Dwight Campbell, Hashim Hamlett  
Quentin Wilson, Salem Hamlett  
Marvin Anderson, Khalid Satary  
John McGhee, Lamar Turner  
Otto Taylor, Shams Diggs  
Timothy Yuknavich, Marvin Hamilton  
Bobby Mabry, John Talley  
Gregory Foster, Tommy Thompson  
Timothy Morris, Fred Ellis

9 (18-107) 10/1/04

CASE NO. \_\_\_\_\_

**BBM**

PLAINTIFFS

VS

US Marshall's Service  
South Fulton Municipal Regional Jail  
US Bureau of Prisons  
US Attorney General DEFENDANTS

Civil Rights Complaint 42 USC 1983

COMES NOW THE PLAINTIFFS PRO SE PURSUANT  
TO 42 USC 1983 AS FOLLOWS

I.

THE PLAINTIFFS CONSTITUTIONAL RIGHTS HAVE BEEN  
VIOLATED PURSUANT TO THE VIII AND XIV AMENDMENTS  
OF THE CONSTITUTION OF THE UNITED STATES

II.

PLAINTIFFS ARE ALL DETAINEES AT THE SOUTH FULTON  
METROPOLITAN REGIONAL JAIL, 6500 WATSON ST, UNION CITY  
GEORGIA, WHICH IS UNDER CONTRACT TO THE US MARSHALLS  
SERVICE, AND UNDER JURISDICTION OF THIS COURT

### III

THE DEFENDANTS HAVE BEEN DELIBERATELY INDIFFERENT TO THE SERIOUS MEDICAL NEEDS OF THE PLAINTIFFS, CAUSING WANTON AND UNNECESSARY PAIN.

### IV

THE DEFENDANTS HAVE WITHHELD AND VIOLATED THE PLAINTIFFS RIGHT TO EXERCISE THEIR RELIGIOUS BELIEFS.

### V

THE DEFENDANTS HAVE FAILED TO PROVIDE ADEQUATE MEALS PURSUANT TO THE GUIDELINES ESTABLISHED BY THE U.S. BUREAU OF PRISONS.

### VI

THE DEFENDANTS HAVE FAILED TO PROVIDE PROPER HYGIENE FACILITIES, ACCESS TO OUTSIDE RECREATION, ACCESS TO LAW LIBRARY OR OTHER LEGAL FACILITIES.

### VII

THE DEFENDANTS HAVE FAILED TO RESPOND TO THE ESTABLISHED GRIEVANCE SYSTEM IN PLACE FOR FEDERAL PRISONERS

WHEREFORE THE PLAINTIFFS ASK THIS COURT FOR IMMEDIATE RELIEF AS FOLLOWS.

THE APPOINTMENT OF COURT MONITOR TO OVERSEE THE CORRECTION OF THESE VIOLATIONS OF CONSTITUTIONAL RIGHTS AND LAW

COMPENSATORY DAMAGES IN THE AMOUNT OF (\$400,000.00)  
 FOUR HUNDRED THOUSAND DOLLARS,  
 PUNITIVE DAMAGES IN THE AMOUNT OF (\$1,000,000.00)  
 ONE MILLION DOLLARS, AND ANY OTHER RELIEF THAT  
 THIS COURT DEEMS PROPER.

Respectfull Submitted This 7th Day OF MARCH 2004

1 <u>William H. S.</u>	2 <u>Bright Campbell</u>	3 <u>Danell Saunders</u>
4 <u>Washin Harlett</u>	5 <u>Quentin Wilson</u>	6 <u>Salv Harlett</u>
7 <u>Mary Anderson</u>	8 <u>Mark Smith</u>	9 <u>John McKeel</u>
10 <u>Lamar Thomas</u>	11 <u>Otto Taylor</u>	12 <u>Thomas Briggs</u>
13 <u>Timmy</u>	14 <u>Morris Harris</u>	15 <u>Timmy Williams</u>
16 <u>John Talley</u>	17 <u>Bobby Maly</u>	18 <u>Tommy Thomas</u>
19 <u>Gregory Foster</u>	20 <u>Fred Ellis</u>	